

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Nebraska

United States of America

v.

WESLEY S. CASSIDY

Defendant(s)

Case No. 4:21MJ3101

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of AUGUST 19, 2021 in the county of DAWSON in the
NEBRASKA District of NEBRASKA, the defendant(s) violated:

Code Section

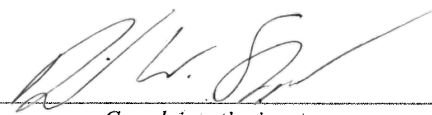
18 USC § 2113(a) & (d)

Offense Description


ARMED BANK ROBBERY

This criminal complaint is based on these facts:

PLEASE SEE THE ATTACHED AFFIDAVIT OF FBI SPECIAL AGENT DAVID SHEPARD.

☒ Continued on the attached sheet.☐ Sworn to before me and signed in my presence.☒ Sworn to before me by telephone or other reliable electronic means.Date: 9/1/2021City and state: LINCOLN, NEBRASKA*Complainant's signature*

DAVID SHEPARD, FBI SA

Printed name and title*Judge's signature*

CHERYL R. ZWART, U.S. MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

I, David W. Shepard, being duly sworn, hereby depose and state as follows:

Affiant's Background

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since May 14, 2017, where I entered on duty at the FBI Academy in Quantico, Virginia. While stationed at Quantico, I received extensive training in conducting Federal investigations to include interviewing witnesses, conducting surveillance, and making arrests. I am currently assigned to the FBI Omaha Field Office, North Platte Resident Agency. One of my responsibilities is investigating violent crimes, including bank robberies, throughout the western Nebraska region.
2. I make this affidavit in support of a complaint charging WELSEY S. CASSIDY for violation of Title 18, United States Code, Sections 2113(a) and (d) (armed bank robbery).
3. The information in this affidavit is based upon my personal knowledge of the events set forth herein, and information provided to me by other law enforcement personnel, and other sources of information. Due to this affidavit being submitted for the limited purpose of obtaining a complaint and arrest warrant, I do not include every fact known to me or other law enforcement personnel concerning this investigation, but outline only those facts that I believe are necessary to establish probable cause.

Probable Cause

4. As set forth in greater detail below, the FBI and Gothenburg Police Department have investigated an armed bank robbery that took place in Gothenburg, Nebraska on August 19, 2021.
5. At approximately 1:15 p.m. on Thursday August 19, 2021 a white male wearing a white baseball cap, black t-shirt, dark pants, and work boots (hereinafter, the "SUBJECT") entered

the Flatwater Bank located at 900 Lake Avenue, Gothenburg, NE 69138. This location is in the District of Nebraska.

6. On that date, Flatwater Bank's fund were insured by the Federal Deposit Insurance Corporation.
7. Upon entering the bank the SUBJECT stood in a customer waiting area near the teller stations. A teller occupied one station and was assisting two customers. When the two customers left, the teller approached the SUBJECT and asked if she could assist him. He asked for water.
8. When the teller returned with the water she asked if she could assist him further. The SUBJECT then produced a pocket knife, with the blade locked in the open position. The SUBJECT demanded money from the teller station and also asked the teller to call the police.
9. The teller placed the cash from the first drawer on the counter. The SUBJECT then asked if there was more money in the other teller drawer. The teller replied there was and the SUBJECT directed her to retrieve that money as well. When the teller had retrieved the second drawer's money, she placed it on the counter.
10. The SUBJECT asked the teller if she had called the police. She told him she had not. The SUBJECT then placed one of the stacks of money in his pocket and left the bank, walking south on Lake Avenue. The teller then activated the silent alarm system.
11. Three bank employees exited the bank and pursued the SUBJECT. When the employees reached the SUBJECT, they asked him if he had been in Flatwater Bank. He said he had. They then asked him if he had taken something. He said he had. The employees told the SUBJECT he needed to come back with them to the bank.
12. The employees then instructed him to put the knife on the ground. The SUBJECT complied and one of the employees picked up the knife.

13. While walking back to the bank, the SUBJECT stated that he was hoping to commit a felony in order to be arrested and go to prison.
14. The employees then placed the SUBJECT in the bank conference room until Gothenburg police arrived and arrested him.
15. The total amount of money removed from the teller drawers and presented to the SUBJECT was \$5,130. The SUBJECT left the bank with \$2,681 in his pocket and left \$2,449 on the teller counter. All funds were recovered and returned to the bank.
16. The SUBJECT was given a Miranda warning and interviewed by Gothenburg Police Sergeant Matt Langley. During the interview, the SUBJECT confirmed his identity as WESLEY CASSIDY. He admitted to committing the robbery and stated that it was pre-meditated for the purpose of removing himself from society.
17. CASSIDY was transported to the Dawson County jail for booking and remains detained on state charges.
18. Based on the foregoing, I submit there is now probable cause to believe that on August 19, 2021, WELSEY S. CASSIDY violated Title 18, United States Code, Sections 2113(a) and (d) (armed bank robbery).

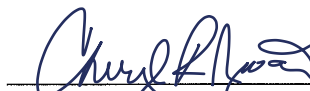
Respectfully submitted,



David Shepard
Special Agent, Federal Bureau of Investigation

Sworn before me by reliable electronic means.

Date: 9/1/2021



CHERYL R. ZWART
United States Magistrate Judge